

May 1, 2019

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge, Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: *In re London Silver Fixing Ltd. Antitrust Litig.*,
Case No. 14-MD-2573 (VEC) (S.D.N.Y.)

Dear Judge Caproni,

Pursuant to Paragraph (8)(a)(1)(vii) of the Discovery Schedule (Dkt. 371), as amended at the January 3, 2019 hearing, the parties jointly submit this letter updating the Court on the progress of discovery.

The parties have met and conferred in good faith and reached agreement on various topics. Most recently, the parties reached agreement on search terms, which should allow for Defendants to begin reviewing and producing responsive custodial documents. But the parties have yet to complete our discussions on other topics, such as non-custodial documents and transaction data. In addition to the work and time it will take for Defendants to review and produce responsive custodial documents pursuant to the agreed-upon search terms and responsiveness review, Defendants are engaged in the first stage of the review and production of audio files, which will be followed by subsequent requests for audio after plaintiffs review the forthcoming document and audio productions.

Pursuant to Your Honor's Order approving the Discovery Schedule, Paragraph (8)(a)(1)(viii), the parties are currently required to "certify by May 31, 2019, that the production of documents and other materials responsive to initial discovery requests is substantially complete." Given the current stage of discovery, the parties request that the Court temporarily suspend the deadlines in the Discovery Schedule. The parties have not previously sought to adjourn the upcoming dates in the Discovery Schedule. The parties will meet and confer and will submit a revised scheduling proposal for the Court's consideration.

Respectfully submitted,

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cc: Counsel of Record (via ECF)